

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES
(NPMHU/USPS-T4—21 AND 22)
(March 9, 2012)**

The United States Postal Service hereby provides the responses of witness Neri (USPS-T-4) to the above-listed interrogatories of the National Postal Mail Handlers Union, dated February 24, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES

NPMHU/USPS – T4-21 Please explain in detail what effect, if any, the USPS decisions on the AMP studies announced on February 23, 2012, and published at <http://about.usps.com/what-we-are-doing/our-futurenetwork/assets/pdf/communications-list-022212.pdf> have on your estimates of productivity improvements, contained on page 29 of your testimony. If there is no effect, please explain why your productivity estimates are not affected by these decisions.

RESPONSE:

I expect no change to my estimates as a result of the AMP study decisions. The productivity estimates are based on the realignment of the mail processing window commensurate with the service standard changes proposed in this docket. They were not developed based on the count of AMPs approved or disapproved. Please see the response to Presiding Officer's Information Request No. 1, Question 7 for more information regarding the development of these productivity estimates.

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NPMHU/USPS – T4-22 Referring to page 28 of your testimony, you state that “[r]educing to less than 200 sorting facilities allows for the elimination of AADC and ADC sortation.” Assuming that the decisions announced on February 23, 2012, and published at <http://about.usps.com/what-we-are-doing/our-futurenetwork/assets/pdf/communications-list-022212.pdf> are implemented, how many sorting facilities will there be in the Postal network?

RESPONSE:

Please see the response to APWU/USPS-T4-27. The file cited in this interrogatory implies that there will be approximately 235 sorting facilities in the Postal Service network, and this number includes network facilities such as Network Distribution Centers, Remote Encoding Centers, and International Service Centers. In addition, this number does not include sites that are still under evaluation. From an ADC and AADC sortation perspective, the Postal Service anticipates that 148 sites will process primary letters, and 148 sites will process primary flats.